

January 26, 2006

Marlene H. Dorch
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Bruce Franca, Acting Chief of the Office of Engineering and Technology
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: ET Docket No. 05-356, Octatron, Inc and Chang Industry, Inc. ("Petitioner")

Dear Ms. Dorch and Mr. Franca:

Pursuant to Sections 1.415 and 1.419 of the Commission's rules, SpectraLink Corporation respectfully requests that the Commission deny the Petitioner's request for waiver of Sections 15.247(b)(3), 15.247(e), and 15.249(a) and deny use of its audio and video surveillance systems over the 902-928 MHz band using analog modulation for the following reasons:

1. Safety Concerns

- SpectraLink wireless telephone system products are deployed at over 1000 hospitals across the United States and are used in critical care situations. Interference from Petitioner's devices could potentially result in loss of life.
- FEMA is a SpectraLink customer who uses SpectraLink systems in disaster call center installations where Petitioner's devices could be anticipated to be used and would likely cause interference.
- Local police and fire departments are SpectraLink customers and, again, interference could easily be anticipated with an undesirable result of communication failures.

2. Technical Concerns

- The noise of the analog emissions throughout this band will inevitably cause problems for any incumbent users to overcome.
- Petitioner's devices would consume a minimum of 25% of the available bandwidth due to the requirements of analog color video.
- By waiving the spectral density requirements of 15.247(e), the interference potential of the 1 Watt EIRP is greatly increased relative to those users complying with the requirement.
- Height restrictions issues are introduced as, for example, at 1 Watt, Petitioner's devices could interfere with a large physical area based on the height the device may be installed.

3. Orderly Administration of Licensed Bands

- Granting a waiver violates the spirit of the ISM band.
- Use of video applications should be kept in bands already allocated for analog video transmission.
- The "temporary" nature of the waiver is not clearly defined.

SpectraLink is greatly concerned that granting permission of a waiver sets a disruptive precedent that directly contradicts the purpose of the FCC to administer and regulate licensed bands especially to incumbent license holders. We strongly urge the Commission to deny Petitioner's request.

Respectfully,



Masood Garahi
CTO, Executive Vice President, Engineering

CC: Leah Maher, VP and General Counsel
Mitch Silver, Sr. Director Engineering Operations